

REFINITIV SA INCORPORATED IN SWITZERLAND

Registration Number of Company: 2001/004570/10

MANUAL IN TERMS OF SECTION 51 OF ACT NO. 2 OF 2000, PROMOTION OF
ACCESS TO INFORMATION ACT)
("THE ACT")

Contents

1	INTRODUCTION	3
2	ABOUT REFINITIV	3
3	AIM	3
4	COMPANY DETAILS.....	4
5	CONTACT DETAILS OF THE CHIEF PRIVACY OFFICER AND INFORMATION OFFICER	5
6	HOW TO OBTAIN ACCESS TO THE GUIDE	5
7	RECORDS THAT ARE AUTOMATICALLY AVAILABLE TO EITHER EMPLOYEES ONLY OR THE GENERAL PUBLIC AND EMPLOYEES	6
8	OTHER TYPES OF RECORDS HELD BY THE COMPANY AS CONTEMPLATED IN SECTION 51(1)(C)	6
9	RECORDS HELD RECORDS HELD BY THE COMPANY IN TERMS OF OTHER LEGISLATION AS CONTEMPLATED IN SECTION 51(1)(D) OF THE ACT	8
10	PROCESS OF REQUESTING INFORMATION NOT AUTOMATICALLY AVAILABLE	9
11	FEES PAYABLE	11
12	INFORMATION OR RECORDS NOT FOUND.....	12
13	INFORMATION REQUESTED ABOUT A THIRD PARTY	12
14	PROCESSING OF PERSONAL INFORMATION	12
15	AVAILABILITY OF THE MANUAL	13
16	UPDATING OF MANUAL	13
	FORM C	14
	A. Particulars of private body	14
	B. Particulars of person requesting access to the record	14
	C. Particulars of person on whose behalf request is made	14
	D. Particulars of record	14
	E. Fees	15
	F. Form of access to record	15
	G. Particulars of right to be exercised or protected	16
	H. Notice of decision regarding request for access	16

1 INTRODUCTION

This information manual is in respect of Refinitiv SA Incorporated in Switzerland, hereinafter referred to as “Refinitiv”. This information manual (“Manual”) provides an outline of the types of records held by Refinitiv and explains how one may submit requests for access to these records in terms of the Promotion of Access to Information Act, 2 of 2000 (the “Act”).

The Act gives effect to everyone’s constitutional right of access to information held by private sector bodies or public bodies that is required for the exercise and/or protection of the requester’s rights.

This Manual is available to view at Refinitiv premises as well as on its website.

2 ABOUT REFINITIV

Refinitiv provides Services to financial industry, compliance and risk professionals, helping them with efficiency tools and data to assess and improve risk and compliance management, analyze and access financial transactions, generate better returns and create efficient, reliable business infrastructure.

3 INTERPRETATION

In this document, clause headings are for convenience and shall not be used in its interpretation unless the context clearly indicates a contrary intention –

3.1 an expression which denotes -

3.1.1 any gender includes the other genders;

3.1.2 a natural person includes an artificial or juristic person and vice versa;

3.1.3 the singular includes the plural and vice versa;

3.2 the following expressions shall bear the meanings assigned to them below and cognate expressions bear corresponding meanings -

3.2.1 “this document” – this document together with all of its annexures, as amended from time to time;

3.2.2 “the company” – Global World-Check Holdings (Nominee) Limited (Incorporated in England);

3.2.3 “the Act” – Promotion of Access to Information Act No. 2 of 2000, as amended from time to time including the regulations promulgated in terms of the Act;

3.2.4 “Information officer” - the person duly authorised by the Chief Privacy Officer and

appointed by the company to facilitate or assist the Chief Privacy Officer with any request in terms of the Act;

3.2.5 "POPIA" – Protection of Personal Information Act No. 4 of 2013.

3.3 any reference to any statute, regulation or other legislation shall be a reference to that statute, regulation or other legislation as at the signature date, and as amended or substituted from time to time;

3.4 if any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it were a substantive provision in the body of this document;

3.5 where any term is defined within a particular clause other than this, that term shall bear the meaning ascribed to it in that clause wherever it is used in this document;

3.6 where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such particular day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding day which is a business day;

3.7 any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months or years, as the case may be;

3.8 the use of the word "including" followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it and the eiusdem generis rule shall not be applied in the interpretation of such general wording or such specific example/s;

3.9 insofar as there is a conflict in the interpretation of or application of this document and the Act, the Act shall prevail;

3.10 this document does not purport to be exhaustive of or comprehensively deal with every procedure provided for in the Act. A requester is advised to familiarise his/her/itself with the provisions of the Act before lodging any request with the company.

4 AIM

To facilitate the requests for access to records of the company as provided for in the Act. This document does not purport to be exhaustive of or comprehensively deal with every procedure provided for in the Act. A requester is advised to familiarise him/her/itself with the provisions of the Act before lodging any request with the company.

5 COMPANY DETAILS

Full name : Refinitiv SA Incorporated in Switzerland;
Registration No. : 2001/004570/10
Company Head : Nadim Najjar
Telephone : +971(4)536784
Email : Nadim.najjar@refinitiv.com

Postal address : P.O Box 2662
Johannesburg
2000

Physical address : 3rd Floor,
The Chelsea
138 West Street
Sandton
2196

Telephone : 011 775 3000
Fax : N/A
Website : www.refinitiv.com

6 CONTACT DETAILS OF THE CHIEF PRIVACY OFFICER AND INFORMATION OFFICER

6.1 Global Data Privacy Officer of the company is Helen Allen. Her contact details are –

Privacy Office, Refinitiv Address	5 Canada Square, Canary Wharf, London E14 5AQ, United Kingdom
Email	privacy.enquiries@lseg.com

6.2 The Information Officer authorised to facilitate requests in terms of the Act is Miss Silindile Mbuli. Her contact details are –

Email	silindile.mbuli@lseg.com
Telephone	+ 27 11 775 3000

7 HOW TO OBTAIN ACCESS TO THE GUIDE

7.1 The Information Regulator has amended, updated and made available a revised guide, as contemplated in section 10(1) of the Act, containing information to assist any person who wishes to exercise any right as contemplated in the Act and POPIA.

7.2 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

- 7.3 The Guide can also be obtained –
- 7.3.1 Upon request to the Information Officer;
 - 7.3.2 From the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 7.4 A copy of the Guide is also available in the following two official languages, for public inspection during normal business hours –
- 7.4.1 English and [Zulu].

8 RECORDS THAT ARE AUTOMATICALLY AVAILABLE TO EITHER EMPLOYEES ONLY OR THE GENERAL PUBLIC AND EMPLOYEES

- 8.1 The following records are automatically available to all employees and need not be requested in accordance with the procedure outlined in paragraph 10 -
- 8.1.1 personnel records are available to the employee whose file it is;
 - 8.1.2 records of disciplinary hearings and related matters are available to the employee concerned;
 - 8.1.3 the company's policies and procedures manual;
 - 8.1.4 the company's document format manual.
 - 8.1.5 The Refinitiv Blue Book
 - 8.1.6 Feature Articles
- 8.2 The following records are automatically and freely available to the general public and all employees on www.refinitiv.com and need not be requested in accordance with the procedure outlined in paragraph 10 -
- 8.2.1 Media Releases
 - 8.2.2 Feature Product Brochures

9 OTHER TYPES OF RECORDS HELD BY THE COMPANY AS CONTEMPLATED IN SECTION 51(1)(C)

These records are not automatically available without a request in terms of the Act. A request in terms of this section is subject to section 63(1) of the Act, which provides that the head of a company must refuse a request for access to a record of the company if the disclosure of the record would involve the unreasonable disclosure of personal information about a third party including a deceased individual.

- 9.1 Statutory Business Records
 - 9.1.1 Certificate of Incorporation
 - 9.1.2 Memorandum of Incorporation
 - 9.1.3 Records relating to the authority of the local authorised signatory

- 9.2 Financial records
 - 9.2.1 financial statements
 - 9.2.2 general ledger
 - 9.2.3 tax returns and assessments
 - 9.2.4 bank statements
 - 9.2.5 electronic banking records
 - 9.2.6 asset register
 - 9.2.7 rental agreement
 - 9.2.8 Invoices
 - 9.2.9 credit agreements
 - 9.2.10 Customer and supplier statements and invoices

- 9.3 Employees' Tax Records:
 - 9.3.1 PAYE records
 - 9.3.2 Records of payments made to SARS on behalf of employees

- 9.4 Statutory compliance documents
 - 9.4.1 VAT certificate
 - 9.4.2 UIF registration
 - 9.4.3 Skills Development Levies
 - 9.4.4 Workmen's Compensation

- 9.5 Information Technology
 - 9.5.1 infrastructure and system records

- 9.6 Insurance
 - 9.6.1 Claim records
 - 9.6.2 Policies

- 9.7 Legal agreements and contracts
 - 9.7.1 Customer contracts

- 9.7.2 Supplier contracts
- 9.8 Environment, Health and Safety
 - 9.8.1 Emergency response plan
 - 9.8.2 Employee public health emergency action plan
 - 9.8.3 Noise exposure records
- 9.9 Personnel Records
 - 9.9.1 Letters of appointment
 - 9.9.2 Employment contracts
 - 9.9.3 Employee information records
 - 9.9.4 Arbitration awards
 - 9.9.5 Pension Fund Records
 - 9.9.6 Disability scheme
 - 9.9.7 Funeral insurance scheme
 - 9.9.8 Group life
 - 9.9.9 Group personal accident
 - 9.9.10 Health and Safety records
 - 9.9.11 Disciplinary records
 - 9.9.12 Salary Records
 - 9.9.13 Leave records
 - 9.9.14 Training and development records
 - 9.9.15 Employee evaluation and performance records
 - 9.9.16 Employment equity plan
 - 9.9.17 Staff loan agreements
 - 9.9.18 Employee Incentive schemes
 - 9.9.19 IRP5 and IT3 certificates
 - 9.9.20 Staff records after employment
 - 9.9.21 Internal policies and procedures

10 RECORDS HELD RECORDS HELD BY THE COMPANY IN TERMS OF OTHER LEGISLATION AS CONTEMPLATED IN SECTION 51(1)(D) OF THE ACT

The following records are not automatically available without a request in terms of the Act -

- 10.1 all statutory returns-

- 10.1.1 VAT;
 - 10.1.2 workmen's compensation;
 - 10.1.3 UIF;
 - 10.1.4 regional services levies; and
 - 10.1.5 Skills development levies.
- 10.2 documents concerning compliance by the company, insofar as it may be necessary, with legal obligations under the following legislation -
- 10.2.1 Attorneys Act, 1979
 - 10.2.2 Basic Conditions of Employment Act, 1997
 - 10.2.3 Broad-based Black Economic Empowerment Act, 2003
 - 10.2.4 Companies Act, 2008 (as amended)
 - 10.2.5 Compensation for Occupational Injuries and Diseases Act, 1997
 - 10.2.6 Electronic Communications Act, 2005
 - 10.2.7 Electronic Communications and Transactions Act, 2002
 - 10.2.8 Employment Equity Act, 1998
 - 10.2.9 Immigration Act, 2002
 - 10.2.10 Income Tax Act, 1962 (as amended)
 - 10.2.11 Labour Relations Act, 1995
 - 10.2.12 Occupational Health and Safety Act, 1993
 - 10.2.13 Promotion of Access to Information Act, 2000
 - 10.2.14 Protection of Personal Information Act, 2013
 - 10.2.15 Protection of Information Act, 1982
 - 10.2.16 Skills Development Amendment Act, 2008
 - 10.2.17 Unemployment Contributions Act, 2002
 - 10.2.18 Unemployment Insurance Act, 2001
 - 10.2.19 Value-Added Tax Act, 1991

11 PROCESS OF REQUESTING INFORMATION NOT AUTOMATICALLY AVAILABLE

- 11.1 A request shall be made on the prescribed form. A copy of the form is attached marked "Form C" ("the prescribed form"). The prescribed form is also available from the website of the Information Regulator, or the website of the Department of Justice and Constitutional Development at www.doj.gov.za.

- 11.2 The prescribed form shall be submitted to the Information Officer at her address or e-mail address, who shall hand it to the Privacy Officer.
- 11.3 The same procedure as set out in 11.1 and 11.2 applies if the requester is requesting information on behalf of another person or on behalf of a permanent employee of the company.
- 11.4 The Privacy Officer, as soon as reasonably possible and within thirty days after the request has been received, shall decide whether or not to grant the request.
- 11.5 The requester will be notified of the decision of the Privacy Officer or the Information officer in the manner indicated by the requester.
- 11.6 If the request is granted, the requester shall be informed by the Privacy Officer or the Information officer in the manner indicated by the requester in the prescribed form.
- 11.7 Notwithstanding the foregoing, the company will advise the requester in the manner stipulated by the requester in the prescribed form of -
- 11.7.1 the access fee to be paid for the information (in accordance with paragraph 11);
- 11.7.2 the format in which access will be given; and
- 11.7.3 the fact that the requester may lodge an appeal with a court of competent jurisdiction against the access fee charged or the format in which access is to be granted.
- 11.8 After access is granted, actual access to the record requested will be given as soon as reasonably possible.
- 11.9 If the request for access is refused, the Privacy Officer or the Information officer shall advise the requester in writing of the refusal. The notice of refusal shall state -
- 11.9.1 adequate reasons for the refusal;
- 11.9.2 that the requester may lodge an appeal with a court of competent jurisdiction against the refusal of the request (including the period) for lodging such an appeal.
- 11.10 Upon the refusal by the Privacy Officer or the Information officer, the deposit paid by the requester will be refunded.
- 11.11 If the Privacy Officer or the Information officer fails to respond within thirty days after a request has been received, it is deemed, in terms of section 58 read together with section 56(1) of the Act, that the Privacy Officer or the Information officer has refused

- the request.
- 11.12 The Privacy Officer may decide to extend the period of thirty days (“original period”) for another period of not more than thirty days if -
- 11.12.1 the request is for a large number of records;
- 11.12.2 the search for the records is to be conducted at premises not situated in the same town or city as the head office of the company;
- 11.12.3 consultation among divisions or departments, as the case may be, of the company is required;
- 11.12.4 the requester consents to such an extension in writing; and
- 11.12.5 the parties agree in any other manner to such an extension.
- 11.13 Should the company require an extension of time, the requester shall be informed in the manner stipulated in the prescribed form of the reasons for the extension.
- 11.14 The requester may lodge an appeal with a court of competent jurisdiction against any extension or against any procedure set out in this section.

12 FEES PAYABLE

- 12.1 The fees for reproduction of a record as referred to in section 52(3) are as follows -
- | | | |
|--------|--------------------------------------------------------------------------|----------|
| 11.1.1 | for every photocopy of an A4 size page or part thereof | R1,10 |
| 11.1.2 | for every printed copy of an A4-size page or part thereof | R0,75 |
| 11.1.3 | for a copy of a compact disc | R70,00 |
| 11.1.4 | for a transcript of visual images for an A4 size page or part thereof | R40,00; |
| 11.1.5 | for a copy of visual images | R60,00; |
| 11.1.6 | for a transcript of an audio record, for an A4-size page or part thereof | R20,00; |
| 11.1.7 | for a copy of an audio record | R30, 00. |
- 12.2 The request fee payable by a requester, other than a personal requester is R50.00.
- 12.3 If the Privacy Officer or if the Information officer is of the opinion that six hours will be exceeded to search, reproduce and/or prepare the information requested, a deposit is payable equal to one-third of an amount of R30 for each hour or part thereof, exceeding the six hours.
- 12.4 A request may be withheld until the fees have been paid.
- 12.5 The most up to date fee structure is available on the website of the Information Regulator at

13 INFORMATION OR RECORDS NOT FOUND

- 13.1 If all reasonable steps have been taken to find a record, and such a record cannot be found or if the records do not exist, then the Privacy Officer or the Information officer shall notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.
- 13.2 The affidavit or affirmation shall provide a full account of all the steps taken to find the record or to determine the existence thereof, including details of all communications by the Privacy Officer or the Information officer with every person who conducted the search.
- 13.3 The notice, as set out in 12.1, shall be regarded as a decision to refuse a request for access to the record concerned for the purposes of the Act.
- 13.4 If the record in question should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form unless access is refused by the Privacy Officer or the Information officer.
- 13.5 The attention of the requester is drawn to the provisions of Chapter 4 of Part 3 of the Act in terms of which the company may refuse, on certain specified grounds, to provide information to a requester.

14 INFORMATION REQUESTED ABOUT A THIRD PARTY

- 14.1 Section 71 of the Act makes provision for a request for information or records about a third party.
- 14.2 In considering such a request, the company will adhere to the provisions of sections 71 to 74 of the Act.
- 14.3 The attention of the requester is drawn to the provisions of Chapter 5 of Part 3 of the Act in terms of which the company is obliged, in certain circumstances, to advise third parties of requests lodged in respect of information applicable to or concerning such third parties. In addition, the provisions of Chapter 2 of Part 4 of the Act entitle third parties to dispute the decisions of the Privacy Officer or the Information officer by referring the matter to the High Court.

15 PROCESSING OF PERSONAL INFORMATION

- 15.1 For more details of how Refinitiv group companies collect, handle, store and protect personal information about you in the context of our services, please refer to our Privacy Statement

available at <https://www.lseg.com/en/policies/privacy-and-cookie-statement> .

16 AVAILABILITY OF THE MANUAL

- 16.1 A copy of this Manual is available –
 - 16.1.1 on www.refinitiv.com ;
 - 16.1.2 head office of Refinitiv SA for public inspection during normal business hours;
 - 16.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 16.1.4 to the Information Regulator upon request.
- 16.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

17 UPDATING OF MANUAL

The company may update this Manual at such intervals as may be necessary

Nadim Najjar

Head of MEA

FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY (Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)

[Regulation 10]

A. Particulars of private body

The Head:

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.
- (b) The address and/or fax number in the Republic to which the information is to be sent must be given.
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:

Identity number:

Postal address:

Fax number:

Telephone number:

E-mail address:

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed *ONLY* if a request for information is made on behalf of another person.

Full names and surname:

Identity number:

D. Particulars of record

- (a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form.
The requester must sign all the additional folios.

- 1 Description of record or relevant part of the record:
- 2 Reference number, if available:
- 3 Any further particulars of record:

E. Fees

- (a) A request for access to a record, other *than* a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) You will be *notified* of the amount required to be paid as the request fee.
- (c) The fee payable for access to a record depends *on* the form *in which* access is required and the reasonable time *required* to search for and prepare a record.
- (d) If you qualify for exemption *of* the payment *of* any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required
Form in which record is required:	
Mark the appropriate box with an X.	
<p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.</p> <p>(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.</p>	

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images this includes photographs, slides, video recordings, computer-generated images, sketches, etc)					
	view the images	copy of the images"	transcription of the images*		
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack audio cassette	transcription of soundtrack* written or printed document			
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*	printed copy of information derived from the record"	copy in computer readable form* (stiffy or compact disc)		
'If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.			<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center; border: none;">YES</td> <td style="width: 50%; text-align: center; border: none;">NO</td> </tr> </table>	YES	NO
YES	NO				

G Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:
2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at..... This..... day of20

SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE

